

Attachment 2

**MCDONNELL DOUGLAS**

*Douglas Aircraft Company*

94FAA-C1-E00-7262  
December 15, 1994

To: Aerospace Industries Association of America, Inc.  
1250 Eye Street N.W., Suite 1200  
Washington, DC 20005

Attention: Howard Aylesworth

Subject: PAAT 3 WG Recommendation for ARAC Approval

Reference: (1) AIA Release PAAT-3 #R02 dated December 7, 1994  
(2) Minority Opinion on Unapproved Parts Draft Advisory Circular,  
Douglas Aircraft Co. letter 94FAA-C1-E00-7169 dated  
December 12, 1994

Dear Howard:

This letter is in response to your reference (1) request for comments to the "Final Recommendation for ARAC Approval-Air Carrier/General Aviation Maintenance Issues ARAC Parts Approval Action Team Phase 3 Work Group" (draft) dated February 7, 1995".

The AIA member companies that are signatories to the Minority Opinion, sent to you by reference (2); Allied-Signal, Allison, Bell and Douglas Aircraft collaborated and integrated our comments to reference 1 and our position is set forth in this letter. Following your protocol provisions these comments represent a consensed position among these signatory companies.

First, for the record, we would like to inform you that the Minority Opinion is the document provided you in reference 2, and is what we want you to go forward with to the Issues Group - not the October 28, 1994 draft.

Second, and related to our position as set forth in the Minority Opinion, there are four (4) critical issues that our member companies are unwilling to compromise associated with unapproved parts:

1. Need for a "fence" around the existing inventory,
2. Exclusion of Commercial and Manufacturers Standard Parts in the draft AC,
3. Exclusion of military surplus parts, in the draft AC, and
4. Need and commitment for concurrent rulemaking.

94FAA-C1-E00-7262

Page 2

Finally, and to meet with your objective, we do have constructive comments to your reference 1 document as attached. For simplification, we have, for the most part, categorized our comments into three categories:

**Comment A:** Ambiguous or unclear-will discuss further at 1/20/95 meeting

**Comment B:** Untrue or untrue based on the lack of a study or data to support this statement-will discuss further at 1/20/95 meeting

**Comment C:** A critical issue - refer to the Minority Opinion.

We agree that the AIA member companies should develop a unified position toward the unapproved parts dilemma and look forward to resolving the critical issues in the January 20, 1995 meeting.

Sincerely,



Gary Bartz, Manager  
Industry and Regulatory Activities  
Douglas Aircraft Company  
3855 Lakewood Blvd., M/C 36-13  
Long Beach, CA, 90846

Copy: Allied-Signal  
Allison  
Bell

Attachment to 94FAA-C1-E00-7262  
December 15, 1994  
Page 1 of 2

Comments to "Final Recommendation...Working Group"  
(draft paper dated February 7, 1995)

<u>No.</u>	<u>Page</u>	<u>Para/Item/Sentence</u>	<u>Comment</u>	<u>Item</u>
1	2	Item 3, 1st para, 1st sentence; "The proper documentation...groups"	B, C	This statement refutes the PAAT-3 WG Charter
2	3	1st para, 2nd sentence; "The FAA has determined...whole"	B	-
3	5	2nd para, 2nd sentence; "This will guarantee...increased".	A, B, C	Increase in existing inventory
4	5	2nd para, 4th sentence; "Installation of all...operation".	B	Increase in existing inventory
5	5	3rd para, 2nd sentence; "Rotorcraft, after...above".	B	Rotorcraft position
6	5	4th para, 1st sentence; "While any, parts...design".	B	-
7	6	1st para, 1st sentence; "Documentation of previously...date".	A, B	Undocumented parts will be purged at a later date.
8	7	Item 4	B,C	Commercial parts
9	7	Item 1.A.2.	B,C	Existing inventory
10	8, 9	Item 4	-	We agree; then by reference to p.4 of draft AC; definition of Undocumented Parts-need a revision to para 6.h.(2) to add "used parts only".
11	10	Item 9, 2nd para, sentence 3 and 4; "Operators...findings".	A	-

Attachment to 94FAA-C1-E00-7262  
December 15, 1994  
Page 2 of 2

12	13	Item 17, 2nd para; "Section 8.a(1)(c) is an attempt...not be done".	A, C	Commercial parts
13	15	Item 22, 2nd para, 1st sentence "The working group...onerous".	A	To compromise the conformity process as a function of experience is establishing a bad precedent.
14	17	Item 25, 2nd para, 3rd sentence "The minority held...sold".	A, B	Only parts made under Part 21 are ones eligible for installation on a certified product.
15	17	Item 25, 2nd para, last sentence "Giving...issue".	B	Not aware that this happened
16	18	Item 26, 1st para; "PAAT 3 WG...in the AC".	B, C	Existing inventory
17	18	Item 27, 1st para; "Section 7.a(5)...including (4)".	-	Conflicts, refer to our comment No. 10.
18	19	Item 27, last para, 3rd sentence, "The AC is based...design".	B, C	Need for concurrent rulemaking
19	19	Item 28, 2nd para, 4th sentence; The working group found...established".	B	
20	19	Item 29, 2nd para; "This is discussed...working groups".	B, C	Exclusion of military surplus parts